REMARKS

In the Office Action, the Examiner rejected claims 1-6, 9, 10, 12-15, and 17-28 under 35 U.S.C. § 103(a) as unpatentable over Lowry (U.S. Patent Application Publication No. 2005/0198070) in view of Chi et al. (Chi) ("Context Query in Information Retrieval," Tools with Artificial Intelligence, 2002, 14th IEEE International Conference) and Nguyen (U.S. Patent No. 5,444,823); rejected claim 7 under 35 U.S.C. § 103(a) as unpatentable over Lowry in view of Chi, Nguyen, and Applicants' alleged admitted prior art (APA); and rejected claim 8 under 35 U.S.C. § 103(a) as unpatentable over Lowry in view of Chi, Nguyen, and Mukherjee et al. ("Automatic Discovery of Semantic Structures in HTML Documents," International Conference on Document Analysis and Recognition, 2003). Applicants respectfully traverse these rejections.

Applicants propose amending claims 1, 3, 10, 12, 14, 17, 19, 22, 23, and 25, and canceling claims 6, 9, 13, 15, and 21. After entry of this amendment, claims 1-5, 7, 8, 10, 12, 14, 17-20, and 22-28 will remain pending.

1. Rejection of Claims 1-5, 10, 12, 14-15, 17-20, and 22-28 under 35 U.S.C. § 103(a)

Pending claims 1-5, 10, 12, 14-15, 17-20, and 22-28 stand rejected under 35 U.S.C. § 103(a) as unpatentable over Lowry in view of Chi and Nguyen.

Proposed amended claim 1 recites a combination of features including, among other things:

> identifying an implicitly defined semantic structure in a document, where a plurality of rules are associated with the implicitly defined semantic structure, and where the semantic

> structure includes a list having a header and a plurality of items associated with the header; . . .
>
> selecting one of the plurality of rules based on a relationship of the locations of the first and second terms within the implicitly defined semantic structure,
>
> where a first rule of the plurality of rules is selected when the first term is located in one of the plurality of items and the second term is located in a different one of the plurality of items,
>
> where a second rule of the plurality of rules, different than the first rule, is selected when the first term is located in one of the plurality of items and the second term is located in the same one of the plurality of items, and
>
> where a third rule of the plurality of rules, different than the first rule and the second rule, is selected when the first term is located in the header and the second term is located in one of the plurality of items; . . . .

Lowry, Chi, and Nguyen, alone or in reasonable combination, do not disclose or suggest the features of proposed claim 1. For example, Lowry, Chi, and Nguyen do not disclose or suggest a first rule, a second rule, and a third rule, as recited in claim 1. Lowry discloses a proximity operator that is to be used in search statements to specify that a record will be retrieved only if the keywords typed as search terms appear within a designated number of words of each other. (See, e.g., Lowry at paras. 9-14.) Lowry also discloses dividing text into domains. (See, e.g., para. 233).

Lowry, however, does not disclose or suggest "a list having a header and a plurality of items associated with the header," or selecting one of a plurality of rules for determining a distance value "where a first rule of the plurality of rules is selected when the first term is located in one of the plurality of items and the second term is located in a different one of the plurality of items," "where a second rule of the plurality of rules . . . is selected when the first term is located in one of the plurality of items and the second term is located in the same one of the plurality of items," and "where a third rule of the

plurality of rules . . . is selected when the first term is located in the header and the second term is located in one of the plurality of items," as recited in proposed claim 1. Rather, Lowry discloses a proximity operator, but not rules as recited in claim 1. (See, e.g., para. 233).

Chi and Nguyen do not cure the deficiencies of Lowry. For at least the foregoing reasons, Applicants submit that proposed claim 1 is patentable over Lowry, Chi, and Nguyen, whether taken alone or in any reasonable combination.

Claims 2-5 depend from claim 1. Therefore, claims 2-5 are patentable over Lowry, Chi, and Nguyen, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to proposed claim 1.

Proposed amended independent claims 10, 12, 22, and 25 recite features similar to (yet of possibly different scope than) features recited in proposed claim 1. Claims 10, 12, 22, and 25 are, therefore, patentable over Lowry, Chi, and Nguyen, whether taken alone, or in any reasonable combination, for at least reasons similar to the reasons given above with respect to proposed claim 1.

Claims 14 and 17-20 depend from claim 12 and are, therefore, patentable over Lowry, Chi, and Nguyen, whether taken alone, or in any reasonable combination, for at least the reasons given with respect to proposed claim 12.

Claims 23 and 24 depend from claim 22 and are, therefore, patentable over Lowry, Chi, and Nguyen, whether taken alone, or in any reasonable combination, for at least the reasons given with respect to proposed claim 22.

Claims 26-28 depend from claim 25 and are, therefore, patentable over Lowry, Chi, and Nguyen, whether taken alone, or in any reasonable combination, for at least the reasons given with respect to proposed claim 25.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 1-5, 10, 12, 14-15, 17-20, and 22-28 based on Lowry, Chi, and Nguyen.

2. Rejection of Claim 7 under 35 U.S.C. § 103(a)

Claim 7 stands rejected under 35 U.S.C. § 103(a) as unpatentable over Lowry in view of Chi, Nguyen, and Applicants' alleged admitted prior art.

Claim 7 depends from claim 1. Without acquiescing that paragraph 5 of Applicants' specification constitutes prior art, Applicants submit that paragraph 5 of Applicants' specification does not cure the deficiencies in Lowry, Chi, and Nguyen noted above with respect to proposed claim 1. Claim 7 is, therefore, patentable over Lowry, Chi, Nguyen, and paragraph 5 of Applicants' specification, whether taken alone or in any reasonable combination.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 7 based on Lowry, Chi, Nguyen, and paragraph 5 of Applicants' specification.

3. Rejection of Claim 8 under 35 U.S.C. § 103(a)

Claim 8 stands rejected under 35 U.S.C. § 103(a) as unpatentable over Lowry in view of Chi, Nguyen, and Mukherjee.

Claim 8 depends from claim 1. Without acquiescing in the Examiner's rejection with respect to claim 8, Applicants submit that Makherjee does not cure the deficiencies in Lowry, Chi, and Nguyen noted above with respect to proposed claim 1. Claim 8 is, therefore, patentable over Lowry, Chi, Nguyen, and Makherjee, whether taken alone or in any reasonable combination.

Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 8 based on Lowry, Chi, Nguyen, and Makherjee.

CONCLUSION

As Applicants' remarks with respect to the Examiner's rejections overcome the rejections, Applicants' silence as to certain assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to dispute these assertions/requirements in the future.

Applicant respectfully requests that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing the claims in condition for allowance. Applicants submit that the proposed amendments of the claims do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the

claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Finally, Applicants submit that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicants submit that this claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

If the Examiner believes that the application is not now in condition for allowance, Applicants respectfully request that the Examiner contact the undersigned to discuss any outstanding issues.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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